

EXHIBIT F

1 IN THE DISTRICT COURT OF THE UNITED STATES
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 ROBERT HUFF,

6 Plaintiff,

7 vs.

Case No. 17-13556

8 Hon. Sean F. Cox

9 Magistrate Elizabeth Stafford

10 VELO ASSOCIATES, PLC, et al,

11 Defendants.
12 _____
13
14

15 The Deposition of SCOTT RENNER,

16 Taken at 1104 Fuller Avenue, N.E.,

17 Grand Rapids, Michigan,

18 Commencing at 10:23 a.m.,

19 Thursday, June 7, 2018,

20 Before Rebecca L. Russo, CSR-2759, RMR, CRR.
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23
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25

1 APPEARANCES:

2

3 CURTIS C. WARNER

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10 Appearing on behalf of the Plaintiff.

11

12 CHARITY A. OLSON

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21 Appearing on behalf of the Defendants.

22

23 ALSO PRESENT:

24 Joshua Kosmerick

25

1 actual data. I certainly don't remember every single
2 lawsuit I've ever filed.

3 Q. Okay. Would you agree that there's a lot of lawsuits
4 that you file?

5 A. Me, as in Scott Renner?

6 Q. As Scott Renner on the signature block under Velo Law
7 Office or any other Velo entity.

8 A. What is "a lot"?

9 Q. Thousands.

10 A. It's possible.

11 Q. Okay. Would there be a way that if somebody were to
12 audit your office, go to your office, would they be
13 able to access through a computer terminal all of the
14 case files that have been placed with Velo office in
15 which a lawsuit had been filed?

16 MS. OLSON: Objection, form --

17 A. I mean, I --

18 MS. OLSON: -- foundation.

19 A. I don't know. I don't participate in any of the
20 statistics of the office, so I have no personal
21 knowledge relating to it.

22 BY MR. WARNER:

23 Q. I'm not asking about statistics. I'm asking about
24 access to files in the office. Who has access to the
25 electronic files in the office?

1 was; what did they say, what did you say?

2 MS. OLSON: Objection, form.

3 A. I mean, I'm an attorney and they're my client, so I'd
4 have to object as to the confidentiality regarding the
5 conversation.

6 BY MR. WARNER:

7 Q. Are you objecting under the attorney-client privilege?

8 A. I am.

9 Q. Do you have a retainer agreement with Sun Homes?

10 A. No, just course of dealing.

11 Q. No written retainer agreement with Sun Homes?

12 A. Just course of dealing.

13 Q. Does Velo Law Office have a written retainer agreement
14 with Sun Homes?

15 A. I can't speak to that. I don't know.

16 Q. Okay. What's your position at Velo Law Office?

17 A. My position?

18 Q. Yes.

19 A. President. That sounds like a good name.

20 Q. Okay. And as president of Velo Law Office, who
21 contracts with the clients, or is it in writing or is
22 it just all oral contracts and course of dealing with
23 all the clients at Velo Law Office?

24 MS. OLSON: Objection as to form, as well
25 as foundation.

1 A. My involvement is a little bit of everything.

2 BY MR. WARNER:

3 Q. Okay.

4 MR. WARNER: Can you repeat the question,
5 please?

6 (The following portion of the record was
7 read by the reporter at 10:54 a.m.:

8 "Q. And as president of Velo Law Office,
9 who contracts with the clients, or is it in
10 writing or is it just all oral contracts
11 and course of dealing with all the clients
12 at Velo Law Office?"

13 BY MR. WARNER:

14 Q. Okay, who at Velo Law Office is responsible for
15 contracting with clients?

16 A. You mean who from our office is the one who says,
17 "Yes, we'll do this"?

18 Q. Who is -- who has authority at Velo Law Office to
19 enter into contracts with the clients?

20 A. Me.

21 Q. Okay. And do you sign contracts to enter into
22 representation agreements with clients?

23 A. I do.

24 Q. And in this case you're saying that you have not
25 entered into any contract in writing with Sun Homes,

1 correct?

2 A. Personally, no.

3 Q. Okay. And is it also correct that there is no written

4 contract between Velo Law Office and Sun Homes?

5 A. I can't speak to that. I don't, I don't know.

6 Q. Okay. Have you looked in Velo Law Office's files to

7 see whether or not there is a contract between Sun

8 Homes and Velo Law Office?

9 A. I have not, in memory.

10 Q. Okay. Do you know that that has been asked of you, of

11 Velo Law Office in discovery?

12 A. I can't -- I'm not sure what the discovery stuff says.

13 Q. Okay. You haven't any idea that, whether or not even

14 plaintiff has issued any discovery in this lawsuit, in

15 the federal lawsuit?

16 A. I have no recollection as to what the discovery says.

17 Q. Okay. Do you know if any has been issued by plaintiff

18 in this federal lawsuit?

19 A. I do.

20 Q. Okay.

21 A. I read them. I just don't remember what they said.

22 Q. Okay. Can you tell me what Exhibit, we marked as

23 Exhibit D is?

24 A. It looks like an account detail report from our

25 office.

- 1 A. I still can't.
- 2 Q. During 2017?
- 3 A. Still can't.
- 4 Q. Currently?
- 5 A. Can't. I don't see every single complaint.
- 6 Q. Okay. What did you -- did you help in the drafting of
- 7 this complaint, I mean personally, other than the
- 8 templates, or did it just become populated?
- 9 A. I don't understand. I mean, I created the template.
- 10 Q. Okay, created the template, okay. And then how does
- 11 the template become populated with numbers, for
- 12 example, such as \$14.52?
- 13 A. You take the mouse and you go to print, and then you
- 14 say "put on list" -- actually, excuse me, you put --
- 15 you select a document, you hit image. It pops up and
- 16 you hit I think just "okay," and it puts it on a print
- 17 list, and then they print it off.
- 18 Q. So it automatically, then, becomes populated by just
- 19 hitting print?
- 20 A. By the data in the software.
- 21 Q. By the data, okay.
- 22 A. I'm under that impression, for the most part.
- 23 Q. Okay. So what do you do before such a complaint on
- 24 behalf of Sun Homes is printed out?
- 25 A. Review the exhibits before deciding -- basically, the

1 client packet to decide what exhibits we want to use,
2 if they're appropriate exhibits, if they -- if the
3 data on them lines up to what was stated, and then
4 those exhibits go in and everything actually gets
5 prepared.

6 And then before signing, we pull up the
7 account and look at the fields as entered and the
8 complaint and verify that the pertinent information
9 looks correct and that the documents as imaged to the
10 system.

11 Q. And how long as to you, of your involvement, prior to
12 the complaint being filed, how long does that take --

13 A. I can't say.

14 Q. -- approximately?

15 A. I mean, some only a couple minutes and some, I mean,
16 indefinitely. Some get rejected.

17 Q. Okay. What about the -- I mean, do you have any
18 knowledge of doing any review of any documents
19 regarding the complaint filed against Mr. Huff?

20 A. I can say that the fact that that label is on there
21 means that I did.

22 Q. And the word exhibit?

23 A. No, where they have the barcode in the top right-hand
24 corner, that one. When they enter the account into
25 our system, they print off a label. That label then

- 1 gets paperclipped to the, we'll call it client packet.
2 The client packet goes into a bin, which every evening
3 I go in, review the packets to make sure that the data
4 provided by the client itself is appropriate, and then
5 I go through the packet, decide what I believe should
6 be the exhibits. I put that label on -- basically, I
7 split it up into what I believe should be exhibits.
8 I put that label in the top right-hand
9 corner, and then I put it into a bin that gets imaged
10 the following morning, and that barcode automatically
11 attaches it to the account and names it complaint
12 exhibits so that they can properly be attached to the
13 complaint when printed.
- 14 Q. Okay. If you turn back one page from that there, it
15 says "Sun Homes, Account Holders, Statement of
16 Account." Do you see that?
- 17 A. Correct.
- 18 Q. What is this document?
- 19 A. That's the basic summary of the balance.
- 20 Q. Okay. And where does this summary come from?
- 21 A. The data as provided from the client.
- 22 Q. Okay. So is this -- when you were doing the print
23 thing you discussed, is that also then printed out at
24 the same time as the complaint?
- 25 A. This?

1 Q. Yes.

2 A. Yes.

3 Q. The statement of account.

4 A. Yes, it should be.

5 Q. Okay. And so the first time that the debtor is going
6 to receive the statement of account is when they get
7 served with the complaint, correct?

8 MS. OLSON: Objection, form, foundation.

9 A. Right. I mean, Mr. Huff, the debtor, most likely -- I
10 mean, it depends on the account, but with Sun Homes,
11 yes, that would be the first time he would receive
12 this.

13 BY MR. WARNER:

14 Q. And what we had marked as Exhibit C, do you know what
15 the document that we have marked as Exhibit C is?

16 A. Do I know what it is?

17 Q. Yes.

18 A. A final statement of security deposit account.

19 Q. Is this a document that you would have reviewed prior
20 to printing out the complaint, Sun Homes versus
21 Robert E. Huff?

22 A. Absolutely.

23 Q. Okay. And so you would have noticed, then, that the
24 client was representing to you, as you say, Sun Homes
25 is your client, the date paid through 6-30-2011; would

1 A. Offhand? Tell me their venue right now.
2 Q. Isn't that --
3 A. Exactly, no.
4 Q. Can you answer my question, please?
5 A. I already did.
6 Q. No, you didn't.
7 A. I said no.
8 Q. Okay. So you as a -- you're a debt collector,
9 correct, that's what you do, you collect consumer
10 debts?
11 A. I'd like to think of myself as an attorney.
12 Q. Can you answer the question, please?
13 MS. OLSON: He just did.
14 BY MR. WARNER:
15 Q. Are you a, are you a debt collector?
16 A. I'm a collections attorney, yes.
17 Q. And you collect debts?
18 A. I guess.
19 Q. Amounts owed or allegedly owed, owed to others?
20 A. I mean, I'm not a collection agency.
21 Q. But you're a debt collector, right?
22 A. Yes.
23 Q. Okay.
24 A. I guess.
25 Q. And isn't one of the requirements under the Fair Debt